

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**In re:**

**Blue Ridge Arsenal, Inc.,**

**Debtor.**

**Case No. 18-10472-KHK**

**Chapter 11**

**NOTICE OF DEBTOR'S APPLICATION TO EMPLOY SPECIAL COUNSEL**

PLEASE TAKE NOTICE that Blue Ridge Arsenal, Inc. ("Debtor"), the Debtor and Debtor-In-Possession herein, by counsel, pursuant to 11 U.S.C. §327 and Federal Rule of Bankruptcy Procedure 2014, has filed papers (specifically that certain *Application to Employ Special Counsel* (the "Application")) requesting the entry of an Order authorizing the employment of Robert S. Naftal, Esq. and the law firm of Robert S. Naftal, P.C. ("Proposed Special Counsel") as special counsel for the purpose of performing special legal services for the Debtor, *nunc pro tunc* to March 1, 2018. Specifically, Proposed Special Counsel will assist in any efforts by the Debtor to sell its assets or obtain new investor financing, including the review of any and all offers and the preparation and/or review of all documents necessary to memorialize and complete any such transaction(s). A copy of the *Application*, with *Verified Statement* and a proposed *Order*, is attached to this Notice.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not wish the court to grant the relief sought in the Application, or if you want the court to consider your views on the Application, then on or before **April 6, 2018 (the "Response Deadline")**, which is fourteen days after the date of service of this Notice and the Application, you or your attorney must:

- ◇ File with the Court, at the following address, Clerk of Court, United States Bankruptcy Court for the Eastern District of Virginia, Alexandria Division, 200 South Washington Street, Alexandria, Virginia 22314, a written response and request for hearing, as required by Local Rule 2014-1. **Unless a written response and request for hearing is filed and served by the Response Deadline, the Court may deem any opposition waived, treat the Application as conceded, and issue an order granting the requested relief without further notice or hearing.** If you mail your response to the Court for filing, you must mail it early enough so the court will **receive** it on or before the date noted above.
- ◇ You must also mail a copy to the persons listed below:

Robert M. Marino, Esq.  
Redmon Peyton & Braswell LLP  
510 King Street, Suite 301  
Alexandria, Virginia 22314

The Office of the United States Trustee, Region 4  
115 South Union Street  
Suite 210  
Alexandria, VA 22314

If you or your attorney do not take any of the foregoing steps by the Response Deadline, the court may decide that you do not oppose the relief sought in the *Application* and may enter an order granting that relief.

Dated: March 23, 2018

Respectfully Submitted,

/s/ Robert M. Marino  
Robert M. Marino, Esq. VSB#26076  
REDMON, PEYTON & BRASWELL, LLP  
510 King Street, Suite 301  
Alexandria, VA 22314  
Phone: 703-684-2000  
Fax: 703-684-5109  
Email: [rmmarino@rpb-law.com](mailto:rmmarino@rpb-law.com)  
Counsel for Blue Ridge Arsenal, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 23<sup>rd</sup> day of March, 2018, caused a copy of this *Notice* to be served electronically through the electronic case filing system to all persons entering their appearance and requesting notice in this case and by first class mail, postage prepaid, to the creditors and parties in interest who are set forth on the attached service list..

/s/Robert M. Marino  
Robert M. Marino